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Attorneys for Defendants
TikTok Inc., ByteDance Inc., TikTok Ltd.,
ByteDance Ltd., and TikTok LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**DECLARATION OF NOREEN YEH IN
SUPPORT OF TIKTOK'S
OMNIBUS MOTION TO SEAL
(PLAINTIFFS' OPPOSITIONS TO
DEFENDANTS' MOTIONS TO
EXCLUDE AND SCHOOL DISTRICT-
SPECIFIC MOTIONS FOR SUMMARY
JUDGMENT)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

This Document Relates to:

ALL ACTIONS

DECLARATION OF NOREEN YEH

I, Noreen Yeh, declare as follows:

1. I am an employee of TikTok Inc. (“TikTok”). I have been employed at TikTok since March 2023. I am an electronic discovery analyst and work within TikTok’s electronic discovery group. As part of my responsibilities, I am familiar with electronic documents, TikTok’s preservation policies, and collection processes.

2. I submit this declaration to explain the sensitive and proprietary nature of the information contained in portions of the Plaintiffs’ Omnibus Opposition to Defendants’ Motions for Summary Judgment (Omnibus Opposition) [Dkt. 2414-1] and in the July 9, 2025 expert report of Dr. Chris Mattmann (Mattmann Report), attached as an exhibit to the declaration of Andrew Mura in Support of Plaintiffs’ Opposition to Defendants’ Motion to Exclude Plaintiffs’ Experts’ General Causation Opinions for Failure to Account for Section 230 and the First Amendment [Dkt. 2409-6]. I have personal knowledge of the following facts and, if called as a witness in the above-referenced action, could competently testify to the matters stated herein.

3. I have reviewed the Omnibus Opposition and Mattmann Report and they contain confidential non-public information that would cause competitive harm to TikTok and/or its customers in the marketplace.

User Data / Operational Metrics

4. The data metrics described in the Omnibus Opposition are used in assessing the performance of various features on the TikTok platform, and the TikTok Defendants’ proprietary methods for calculating those metrics.

5. These metrics are key indicators of the TikTok platform’s performance and competitive position in the market. Among other things, the disclosure of these data will provide competitors with the latest insight into TikTok’s user engagement trends and strategies over time and across features, including information about the usage of particular features of the TikTok platform and data related to accounts created on the TikTok platform. These metrics are used to evaluate the effectiveness of platform features or policies relative to TikTok’s competitors, and for the company to plan for future platform features or policies. Making usage statistics and

1 operational metrics public would risk revealing TikTok's strategy regarding platform features or
2 policies to its competitors. And TikTok also relies on usage statistics and metrics to guide its
3 strategy with partners, including advertisers, and in its negotiations with those partners. Making
4 this information public would harm TikTok's ability to negotiate with its partners.

5 **Revenue and Financial Information**

6 6. The confidential financial information described in the Omnibus Opposition
7 includes details about TikTok's advertising revenue and advertising spend, including daily and
8 quarterly revenue, revenue targets, and revenue attributed to particular platform features.

9 7. This information reveals details about TikTok's strategic monetization priorities.
10 Making this information public would expose to competitors the company's revenue planning
11 framework and overall business strategy. This would give competitors visibility into TikTok's
12 internal performance benchmarks and also insight into the decision-making principles that guide
13 various strategic initiatives. Further, the information would also provide advertisers with
14 information and insights that they could use to negotiate against TikTok. Making such granular
15 information about TikTok's business operations public would harm its competitive standing. The
16 harms would be particularly pronounced here because as a private company, TikTok does not make
17 this type of information available in the ordinary course.

18 **Internal Proprietary Processes**

19 8. Both the Omnibus Opposition and the Mattmann Report contain detailed
20 descriptions about TikTok's proprietary methods regarding the design and operation of its platform.
21 TikTok goes to great lengths to keep this information confidential as it directly relates to the
22 architecture of TikTok's technology. TikTok maintains this information as confidential trade secret
23 information.

24 9. The Omnibus Opposition describes proprietary features of TikTok's algorithm and
25 the way that it is programmed. The Mattmann Report discloses highly confidential, proprietary
26 information regarding TikTok's use of neural network architectures, backend algorithms, testing
27 methodologies, and system level safety designs. His report contains detailed strategies used to
28 identify prohibited users and detect harmful or inappropriate content.

1 10. Disclosure would harm TikTok in two ways. First, it would allow competitors to
2 duplicate TikTok's proprietary methods without incurring the associated development costs or
3 risks. This would undermine TikTok's value and competitive advantage. Second, particularly as
4 it relates to the extensive and detailed operational information contained in the Mattmann Report,
5 disclosure of such information would allow bad actors to identify and circumvent TikTok's
6 detection systems. This would both compromise system integrity and create significant safety and
7 security risks for users.

8 **Proprietary Information Related to Third Parties**

9 11. The Omnibus Opposition contains descriptions of various confidential agreements
10 between TikTok and third-party partners. The descriptions include information detailing the
11 identities of the third parties, the specific payment terms, and other confidential clauses.

12 12. This information reveals confidential business strategy regarding TikTok's third-
13 party partners. Disclosing this information publicly would harm TikTok's ability to negotiate with
14 its partners, eroding the company's ability to negotiate effectively and maintain flexibility in future
15 deals. This information also implicates the privacy interest of TikTok's strategic partners, who
16 trust TikTok to safeguard their proprietary information. Disclosure of such information would
17 expose these third parties' own confidential business strategies and compromise their own
18 competitive position in the marketplace.

19 **Employee Identifying Information**

20 13. The Omnibus Opposition is replete with references to first and last names of current
21 and former TikTok employees who are not parties to this litigation. Given the high-profile nature
22 of this litigation, public disclosure of employees' names and titles could expose them to unwanted
23 attention, solicitation, or harassment, including from individuals who might wrongly associate
24 allegations against TikTok with specific employees.

25 14. Given the sensitive and personal nature of this information, redacting it is necessary
26 to protect these individuals' privacy.

TikTok Keeps This Information Confidential

15. The TikTok Defendants do not disclose the above information publicly in the ordinary course of business. Disclosure of this information to the public or TikTok's competitors would cause significant harm to TikTok. TikTok competes with many companies, including companies that facilitate the ability of users to share, communicate, and discover content and information online. TikTok faces intense competition in its business. As a result, TikTok takes great care to protect information related to its metrics, business information, and business strategies.

16. Given the highly competitive nature of the social media industry, there is a substantial probability the disclosure of this information will give TikTok's competitors an unfair advantage and competitively harm TikTok and/or its customers in the marketplace.

17. The proposed redactions to the Omnibus Opposition and Mattmann Report, which I have reviewed, are tailored to redact only the confidential information discussed herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 10th day of December, 2025, in New York City, New York.


Noreen Yeh